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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

NOV 14 2017

SEAN F. McAVOY, CLERK
DEPUTY
YAKIMA, WASHINGTON

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KENNETH WILLIAM ALLISON,

Defendant.

NO. 4:17-CR-6044-SMJ

INDICTMENT

Ct. 1: 18 U.S.C. § 2423(b)
Travel with Intent to Engage in
Illicit Sexual Conduct

Ct. 2: 18 U.S.C. § 2422(b)
Attempted Enticement of a Minor

Notice of Criminal Forfeiture
Allegations

The Grand Jury charges that:

COUNT 1

On or about September 14, 2017, Defendant, KENNETH WILLIAM
ALLISON, did travel in interstate commerce from the District of Idaho to the Eastern
District of Washington, for the purpose of engaging in illicit sexual conduct, with
another person, namely, a sexual act, as defined in Title 18, United States Code,

1 Section 2246, with a person under eighteen (18) years of age that would be in
2 violation of Chapter 109A of Title 18, United States Code, had the sexual act occurred
3 in the special maritime and territorial jurisdiction of the United States.

4 Specifically, Defendant, KENNETH WILLIAM ALLISON, traveled from
5 Idaho to Washington for the purpose of engaging in a sexual act that would be a
6 violation of Title 18, United States Code, Section 2243, which prohibits ALLISON
7 from knowingly engaging in a sexual act with another person (within the special
8 maritime and territorial jurisdiction of the United States), who has attained the age of
9 twelve (12) years but has not attained the age of sixteen (16) years, and who is at least
10 four years younger than ALLISON, such sexual act to be:

- 14 a) Contact between the penis and the vulva, the penis and the anus, the mouth
15 and the penis, the mouth and the vulva, and the mouth and the anus;
- 17 b) Penetration of the anal or genital opening of another by a hand, finger or
18 any object with an intent to abuse, humiliate, harass, degrade or arouse or
19 gratify the sexual desire of any person; or
- 21 c) Intentional touching, not through the clothing, of the genitalia of another
22 person who has not attained the age of sixteen years with an intent to abuse,
23 humiliate, harass, degrade, or arouse or gratify the sexual desire of any
24 person,

26 all in violation of Title 18, United States Code, Section 2423(b).

COUNT 2

From on or about August 25, 2017, through on or about September 14, 2017, within the Eastern District of Washington, Defendant, KENNETH WILLIAM ALLISON, did unlawfully and knowingly use a facility and means of interstate and foreign commerce, namely, the Internet, to attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to wit, Minor Victim K., to engage in sexual activity for which a person can be charged with a criminal offense, including Revised Code of Washington 9A.44.076, Rape of a Child in the Second Degree, all in violation of Title 18, United States Code, Section 2422(b).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

1. The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2428.

2. Pursuant to Title 18, United States Code, Section 2428, upon conviction of an offense(s) in violation of Title 18, United States Code, Sections 2422 or 2423, Defendant, KENNETH WILLIAM ALLISON, shall forfeit to the United States of America any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the offense[s] and any property, real or

1 personal, constituting or derived from any proceeds obtained, directly or indirectly, as
2 a result of the offense(s).

3 3. If any of the property described above, as a result of any act or omission
4 of the Defendant:
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- 6 a. cannot be located upon the exercise of due diligence;
- 7 b. has been transferred or sold to, or deposited with, a third party;
- 8 c. has been placed beyond the jurisdiction of the court;
- 9 d. has been substantially diminished in value; or
- 10 e. has been commingled with other property which cannot be divided
11 without difficulty,

12 the United States of America shall be entitled to forfeiture of substitute property
13 pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28,
14 United States Code, Section 2461(c).
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17 DATED: November 14, 2017

A TRUE BILL
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